

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

KATELYN HANKS, §
§
PLAINTIFF, §
§
§
VS. § CIVIL ACTION NO 3:18-CV-02711-N
§
§
§
PALETAS POP, LLC and GOOD SPACE X, LLC §
§
DEFENDANTS. §

**UNOPPOSED MOTION TO EXTEND DEFENDANT'S
ANSWER DATE**

COMES NOW, **GOOD SPACE X, LLC**, Defendant in the above entitled and numbered cause ("Defendant"), and moves the Court to extend the deadline for Defendant to file an Answer or otherwise respond to Plaintiff's Complaint, and in support therefore Defendant respectfully states as follows:

I.

The undersigned law firm has just been retained as counsel for Defendant.

II.

Defendant's Answer to Plaintiff's Complaint and/or other responsive pleadings are due by Monday, November 19, 2018, and Defendant respectfully moves the Court to grant this Motion to extend Defendant's deadline to file an Answer or otherwise respond to the Complaint for a period of thirty (30) days or up to and including December 19, 2018.

III.

Counsel for the Plaintiff has no objection and in fact has agreed to extending Defendant's deadline to respond to the Complaint for a period of thirty (30) days up to and including December 19, 2018.

IV.

For good cause, and in accordance with Fed.R.Civ.P. 6, Defendant files this Motion to Extend Defendant's Answer Date for a period of thirty (30) days. Good cause exists for the requested extension in that Defendant has just retained litigation counsel, and said counsel needs additional time to obtain further information from Defendant in order to effectively respond to the Complaint.

No party will be prejudiced by the requested extension and all parties, including Plaintiff, have consented to the requested extension.

WHEREFORE, PREMISES CONSIDERED, Defendant GOOD SPACE X, LLC respectfully requests that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint up to and including December 19, 2018.

Respectfully submitted,

MUSGROVE LAW FIRM, P.C.

By: /s/ Cami L. Boyd

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**ATTORNEYS FOR DEFENDANT
GOOD SPACE X, LLC**

CERTIFICATE OF CONFERENCE

This is to certify that Counsel for Defendant Good Space X, LLC has conferred with Douglas Schapiro, Attorney-in –Charge for Plaintiff, and Mr. Schapiro does not object and has agreed to the extension requested in this motion.

/s/ Cami L. Boyd

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Extend Defendant's Answer Date was served upon all parties of record through their counsel on November 9, 2018 via the Court's ECF filing system and via electronic mail.

/s/ Cami L. Boyd